## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

| MARC VEASEY, et al, | § |                                |
|---------------------|---|--------------------------------|
|                     | § |                                |
| Plaintiffs,         | § |                                |
| VS.                 | § | CIVIL ACTION NO. 2:13-CV-00193 |
|                     | § |                                |
| RICK PERRY, et al,  | § |                                |
|                     | § |                                |
| Defendants.         | § |                                |

## UNOPPOSED MOTION TO WITHDRAW, WITHOUT PREJUDICE, <u>PLAINTIFF PEGGY DRAPER HERMAN</u>

Pursuant to Rule 21 of the Federal Rules of Civil Procedure, Plaintiffs Marc Veasey, Jane Hamilton, Sergio De Leon, Floyd J. Carrier, Anna Burns, Michael Montez, Penny Pope, Oscar Ortiz, Koby Ozias, John Mellor-Crummey, Peggy Herman, Evelyn Brickner, Gordon Benjamin, Ken Gandy, (collectively, the "Veasey Individual Plaintiffs") and the League of United Latin American Citizens ("LULAC") move for the withdrawal, without prejudice, of Plaintiff Peggy Draper Herman as a party in this action. Counsel for Defendants have advised that they do not oppose this motion.

The Veasey Individual Plaintiffs, LULAC and Ms. Draper Herman respectfully request that this Court enter an order voluntarily withdrawing Ms. Draper Herman, from this litigation.

Dated: September 4<sup>th</sup>, 2014

Respectfully Submitted,

/s/ Neil G. Baron

Neil G. Baron

State Bar No.: 017970180 Law Office of Neil G. Baron

914 FM 517 W., Ste. 242 Dickinson, Texas 77539 281/534-2748 – Main 281/534-4309 – Fax neil@ngbaronlaw.com – E-mail

Chad W. Dunn
TBN 24036507; Fed. I.D. No. 33467
K. Scott Brazil
TBN 02934050; Fed. I.D. No. 2585
4201 Cypress Creek Parkway, Suite 530
Houston, Texas 77068
Telephone: (281) 580-6310
Facsimile: (281) 580-6362
E-Mail: chad@brazilanddunn.com

E-Mail: chad@brazilanddunn.com E-Mail: scott@brazilanddunn.com

J. Gerald Hebert

## District of Columbia State Bar No. 447676 Emma Simson Maryland Bar Campaign Legal Center 215 F. Street NE

Campaign Legal Center 215 E. Street, NE Washington, DC 20002 202/736-2200, ext. 12 – Main 202/736-2222 – Fax ghebert@campaignlegalcenter.com

ghebert@campaignlegal center.org-E-mail

David Richards
State Bar No.: 16846000
Richards, Rodriguez & Skeith, LLP
816 Congress Avenue, Ste. 1200
Austin, Texas 78701
512/476-0005 – Main
daverichards@june.com – E-mail

Armand G. Derfner
Derfner, Altman & Wilborn, LLC
P.O. Box 600
Charleston, S.C. 29402
843/723-9804 – Main
aderfner@dawlegal.com – E-mail

ATTORNEYS FOR PLAINTIFFS

Craig M. Watkins
Dallas County District Attorney
State Bar No. 00791886
Teresa G. Snelson
Chief, Civil Division
Dallas County District Attorney's Office
State Bar. No. 08577250
411 Elm Street, 5<sup>th</sup> Floor
Dallas, TX 75202-4606
Telephone (214) 653-7358
Facsimile (214) 653-6134
Teresa.Snelson@dallascounty.org

ATTORNEYS FOR DALLAS COUNTY, TEXAS

Luis Roberto Vera, Jr. LULAC National General Counsel State Bar No. 20546740 The Law Offices of Luis Vera Jr., and Associates 1325 Riverview Towers, 111 Soledad San Antonio, Texas 78205-2260 Telephone (210) 225-3300 Facsimile (210) 225-2060 Irvlaw@sbcglobal.net

ATTORNEY FOR LULAC

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 4<sup>th</sup>, 2014, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Neil G. Baron

Neil G. Baron